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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

IN RE: TOYOTA MOTOR CORP.
UNINTENDED ACCELERATION
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

8:10ML2151 JVS (FMOx)

MDL 2151

Honorable James V. Selna

This document relates to:

Case No. 11-cv-08120 JVS (FMOx)

SHIRLENE VAN ALFEN, et al.

Plaintiffs,

vs.

TOYOTA MOTOR SALES, U.S.A., INC.,
a California corporation, et al.

Defendants.

**APPLICATION TO FILE AND
MAINTAIN UNDER SEAL MOTION BY
PLAINTIFFS' TO COMPEL TOYOTA'S
PRODUCTION OF: (1) EDR SOURCE
CODE; (2) 2012 BRADE OVERRIDE
SOFTWARE CODE; (3) POWER ASIC,
MOTOR DRIVE ASIC, AND ESP-B2
CODE AND EXHIBITS 9-13, 20-21, 23-30,
32-33, 35, 40-41, and 43-45 TO
DECLARATION OF MARK P.
ROBINSON, JR.**

Date: May 23, 2012
Time: 10:00 a.m.
Location: JAMS – Orange County

Pursuant to C.D. Cal. Local Rule 79-5.1 and the Protective Order, Plaintiffs submit the following application for an order to file and maintain under seal the documents filed by Plaintiffs in connection with Motion By Plaintiffs' To Compel Toyota's Production Of: (1) EDR Source Code; (2) 2012 Brake Override Software Code; (3) Power ASIC, Motor Drive ASIC, And ESP-B2 Code And Exhibits To Declaration Of Mark P. Robinson, Jr.. Plaintiffs have manually filed the following documents that reference or are designated as confidential and/or proprietary information:

- Motion By Plaintiffs' To Compel Toyota's Production Of: (1) EDR Source Code; (2) 2012 Brake Override Software Code; (3) Power ASIC, Motor Drive ASIC, And ESP-B2 Code;
- Exhibits 9-13, 20-21, 23-30, 32-33, 35, 40-41, and 43-45 To Declaration Of Mark P. Robinson, Jr.

The above-referenced documents contain information that has been designated as "confidential".

Plaintiffs respectfully request that these documents be maintained under seal.

Dated: May 21, 2012

By: /s/ Mark P. Robinson, Jr.
MARK P. ROBINSON, JR.
Attorneys for Plaintiffs